

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

ANGEL FEATHER,	)	CASE NO.
	)	
Plaintiff,	)	JUDGE:
	)	
vs.	)	<b><u>NOTICE OF REMOVAL</u></b>
	)	
MAHONING COUNTY SHERIFF'S	)	
OFFICE, et al.,	)	
	)	
Defendants.	)	

TO THE JUDGES, UNITED STATES DISTRICT COURT, NORTHERN DISTRICT  
OF OHIO, EASTERN DIVISION:

1. On April 1, 2021, Plaintiff Angel Feather commenced an action in the Mahoning County Court of Common Pleas, Ohio, bearing Case No. 2021 CV 00535 entitled “*Angel Feather v. Mahoning County Sheriff's Office, et al.*,” praying judgment against Defendants. Said action is predicated on alleged violations of Plaintiff’s rights under the Family and Medical Leave Act and is brought pursuant to 29 U.S.C. § 2615(a). Said action is wholly of a civil nature of which this Court has original jurisdiction under the provisions of Title 28, United States Code, Sections 1343(a)(3) and/or 1331, and is one which may be removed to this Court pursuant to the provisions of Title 28 United States Code Section 1441(a) and (b), as being a civil action involving a claim or claims over which this Court has original jurisdiction and involving a claim or right arising under the Constitution, treaties or laws of the United States, all of which more fully appears in the Plaintiff Complaint, a copy of which is attached hereto and incorporated herein by reference.

2. Said action also contains certain pendent state law claims over which this Court has jurisdiction under the provisions of 28 United States Code Section 1367.

3. A copy of the Summons and Complaint in the case aforesaid was served upon Defendants, Mahoning County Sheriff's Office and Board of Mahoning County Commissioners, on April 7, 2021 under and by virtue of Rule 4.3 of the Ohio Rules of Civil Procedure.

4. Defendants attach hereto, and file herewith, a copy of the Summons and Complaint served as aforesaid, as well as copies of all other process, pleadings and orders served upon them.

5. Without waiving their defense that the Mahoning County Sheriff's Office is not *suit juris*, all Defendants join in this Notice of Removal.

WHEREFORE, Defendants pray that the case presently pending against them in the Mahoning County Court of Common Pleas be removed to this Court and proceed herein according to law.

Respectfully submitted,

MAZANEC, RASKIN & RYDER CO., L.P.A.

s/Kathleen M. Minahan

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*Counsel for Defendants Mahoning County  
Sheriff's Office and Board of Mahoning County  
Commissioners*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 4, 2021, a copy of the foregoing Notice of Removal was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

*s/Kathleen M. Minahan*

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KATHLEEN M. MINAHAN (0064989)

*Counsel for Defendants Mahoning County  
Sheriff's Office and Board of Mahoning County  
Commissioners*

CORSA-200087/Notice of Removal